

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE: :  
Vera D. McFarland : Chapter 13  
: No.: 20-11596-AMC  
Debtor(s) :  
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**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY U.S. BANK NATIONAL ASSOCIATION**

Debtor, Vera D. McFarland, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by U.S. Bank National Association., hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. Debtor asks for the chance to catch up.
7. Debtor is unsure of the same and asks for the chance to catch up.
8. Denied.
9. No response required.

WHEREFORE, based on the aforementioned, Debtors respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: February 24, 2022

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West**  
Standing Chapter 13 Trustee  
Electronic Notice

**Rebecca A. Solarz, Esq.**  
Attorney for Movant *U.S. Bank National Association*  
Electronic Notice to *bkgroup@kmllawgroup.com*

Dated: February 24, 2022

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
Attorney for Debtor  
1315 Walnut Street  
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Philadelphia, PA 19107